

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

MONICA CANNON-GRANT,

Defendant.

Case No. 1:22-cr-10057-AK

**DEFENDANT'S MOTION IN LIMINE TO PRECLUDE
INFLAMMATORY REFERENCES TO THE ALLEGED FAKE NEGATIVE
COVID-19 RESULTS LETTER DRAFTED BY MONICA COLEMAN**

Defendant Monica Cannon-Grant hereby moves *in limine* to preclude the government from introducing or referencing the COVID-19 test results letter (the “Letter”) that the government alleges Monica Coleman falsified and wrote for Ms. Cannon-Grant and her husband Clark Grant so that they could attend a Boston Celtics game. The subject of the Letter is likely to provoke strong negative emotions from jurors. The government included references to the Letter in the Indictment¹, but the Letter itself is not part of any charge against Ms. Cannon-Grant. Indictment at ¶ 61 n.7. The government has represented that it does not intend to introduce evidence of the Letter in its case-in-chief but has reserved the right to introduce the Letter or reference it during cross-examination. The Letter should be excluded under Federal Rule of Evidence 403 (“Rule 403”) because it is of limited probative value and the risk that it will unfairly prejudice Ms. Cannon-Grant substantially outweighs that probative value.

¹ All references herein to the Indictment refer to the Superseding Indictment. ECF No. 92.

RELEVANT FACTS

Monica Coleman and Ms. Cannon-Grant grew up together in Boston and remained good friends from their youth through adulthood. In 2017, Ms. Cannon-Grant asked her long-time friend Monica Coleman to serve as a board member for Violence in Boston (“VIB”), the social justice foundation Ms. Cannon-Grant established to address violence, raise social awareness, and support community causes within Boston. In or around June of 2020, Ms. Cannon-Grant asked Coleman to take a more active role with VIB to assist with the organization’s finances. It was not until 2021 that Ms. Cannon-Grant officially hired Ms. Coleman to serve as VIB’s Chief Financial Officer.

During the pandemic, but prior to becoming VIB’s Chief Financial Officer, Coleman apparently drafted a “fake negative COVID-19 test result letter” for Ms. Cannon-Grant and Mr. Grant so that they could attend a Boston Celtics game (the Letter). *Id.* at ¶ 61 n.7.

APPLICABLE LAW

Federal Rule of Evidence 401 provides that evidence must be “relevant” to be admissible. In order to be “relevant,” the evidence must help to prove a fact that “is of consequence in determining the action.” Rule 403 provides that, even if evidence is “relevant,” a court may nevertheless exclude the evidence if its potential for unfair prejudice substantially outweighs its probative value.

ARGUMENT

The subject of the Letter and the circumstances surrounding the Letter are highly inflammatory. The COVID-19 pandemic is barely in our rear-view mirror and people in the Massachusetts community still hold strong opinions about how others acted in response to the public health concerns posed by the virus. If the government were to elicit testimony or evidence that Ms. Cannon-Grant “request[ed]” that Coleman “prepare[] a fake negative COVID-19 test

result letter[]” so that she “could attend a Boston Celtics game,” it would unfairly prejudice her. Therefore, even assuming that the Letter has some minimal probative value, the risk of unfair prejudice substantially outweighs it, and the evidence should be excluded under Rule 403.

CONCLUSION

For the reasons stated above, the Defendant’s motion *in limine* should be granted.

Respectfully submitted,

/s/ George W. Vien
George W. Vien (BBO # 547411)
Emma Notis-McConarty (BBO # 696405)
DONNELLY, CONROY & GELHAAR, LLP
260 Franklin Street, Suite 1600
Boston, Massachusetts 02110
(617) 720-2880
gwv@dcglaw.com
enm@dcglaw.com

Dated: September 2, 2025

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for the Defendant has conferred with counsel for the government in good faith to resolve or narrow the issues presented in this motion, and that the disputed issues remain unresolved.

/s/ George W. Vien
George W. Vien

CERTIFICATE OF SERVICE

I hereby certify that this document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing on September 2, 2025.

/s/ George W. Vien
George W. Vien